

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
CHARLESTON DIVISION

Jay Connor,

Plaintiff,

v.

Palmetto Solar LLC, Crisp Clean Solar
LLC, James Austin Crisp Individually,
and John Does 1-10,

Defendants.

2:22-cv-03963-DCN

Palmetto Solar, LLC's Answers to Local Civil Rule 26.01 Interrogatories

Defendant Palmetto Solar, LLC ("Palmetto Solar") submits these answers to the Local Civil Rule 26.01 Interrogatories:

(A) State the full name, address, and telephone number of all persons or legal entities who may have a subrogation interest in each claim and state the basis and extent of that interest.

Answer: Palmetto Solar is not currently aware of any person or legal entity who may have a subrogation interest in any of Plaintiff's claims.

(B) As to each claim, state whether it should be tried jury or nonjury and why.

Answer: No party has requested a jury trial. Accordingly, all claims should be tried non-jury.

(C) State whether the party submitting these responses is a publicly-owned company and separately identify (1) any parent corporation and any publicly-held corporation owning ten percent (10%) or more of the party's stock; (2) each publicly-owned

company of which it is a parent; and (3) each publicly-owned company in which the party owns ten percent (10%) or more of the outstanding shares.

Answer: Palmetto Solar a wholly owned subsidiary of Palmetto Clean Technology, Inc., a Delaware corporation. Neither are publicly-owned companies.

(D) State the basis for asserting the claim in the division in which it was filed (or the basis of any challenge to the appropriateness of the division).

Answer: Palmetto Solar removed this action to the Charleston division because it was originally filed in the Court of Common Pleas for Charleston County, South Carolina, which is within the Charleston Division.

(E) Is this action related in whole or in part to any other matter filed in this District, whether civil or criminal?

Answer: Palmetto Solar is not aware of any related actions filed in this District.

(F) If the defendant is improperly identified, give the proper identification and state whether counsel will accept service of an amended summons and pleading reflecting the correct identification.

Answer: Based on information presently available and upon information and belief, Palmetto Solar has been properly identified.

(G) If you contend that some other person or legal entity is, in whole or in part, liable to you or the party asserting a claim against you in this matter, identify such person or entity and describe the basis of their liability.

Answer: Palmetto Solar is currently investigating whether another entity is responsible for indemnifying Palmetto Solar in this matter. Because this case is only in its initial stages, Palmetto Solar reserves the right to supplement this response if necessary.

NELSON MULLINS RILEY & SCARBOROUGH LLP

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